

REMARKS

The Official Action mailed January 25, 2007, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on June 14, 2004; December 27, 2005; January 18, 2006; and May 15, 2006.

Claims 1-22 were pending in the present application prior to the above amendment. Claims 12-15 have been canceled without prejudice or disclaimer, claims 1-11 and 22 have been amended to better recite the features of the present invention, and new dependent claims 23-27 have been added to recite additional protection to which the Applicant is entitled. Accordingly, claims 1-11 and 16-27 are now pending in the present application, of which claims 1-10 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 1-19, 21 and 22 as obvious based on the combination of U.S. Patent No. 4,766,471 to Ovshinsky and U.S. Patent No. 4,888,625 to Mueller. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

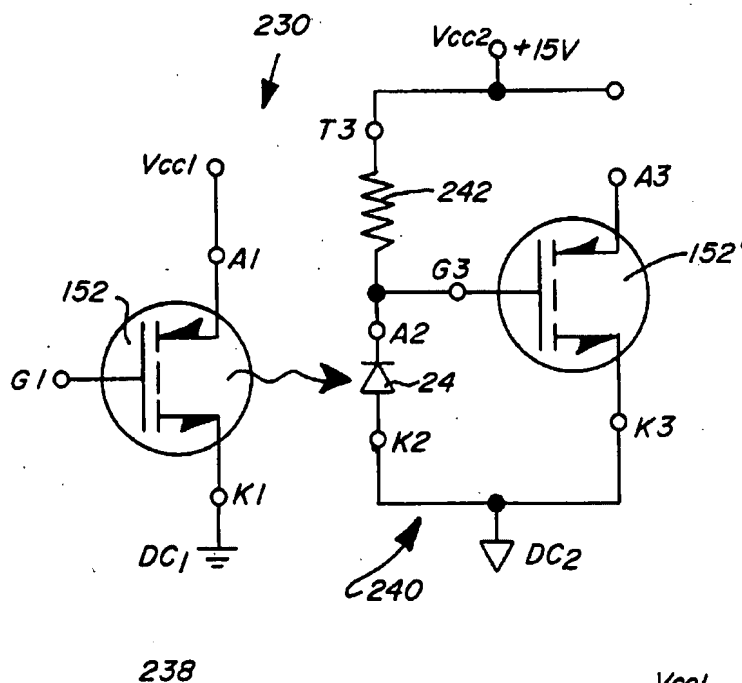
As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the

teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended.

Regarding claims 1-8, the Official Action asserts that "Ovshinsky et al. discloses ... a light emitting element (layer 158 of device 232) and a light receiving element (layer 42 of device 234) electrically connected to one of the stacked semiconductor elements; ... the light emitting element to comprise a first electrode (154), a second electrode (164) and an electro-luminescent layer (158) laminated between the electrodes" (page 3, Paper No. 20070115). The Applicant respectfully disagrees and traverses the assertions in the Official Action.

Ovshinsky does not appear to teach or suggest a light emitting element electrically connected to a semiconductor element (Figure 6B is reproduced below).



In Figure 6B of Ovshinsky, electrical input circuit 238 has a light emitter (or DIFET) 152, but if the light emitter 152 is regarded as a light emitting element, then Ovshinsky does not teach that a semiconductor element is electrically connected to the light emitter 152. Likewise, if the DIFET 152 is regarded as a semiconductor element, then Ovshinsky does not teach or suggest that a light emitting element is electrically connected to the semiconductor element. Therefore, Ovshinsky does not teach or suggest a light emitting element electrically connected to a semiconductor element.

Mueller does not cure the deficiencies in Ovshinsky. Mueller is relied upon to allegedly teach a resin used to hold together a light emitting device and a light receiving device (page 4, Paper No. 20070115). However, Mueller does not teach that Ovshinsky should be modified such that a light emitting element is electrically connected to a semiconductor element.

Also, claims 1-8 have been amended to recite a first semiconductor element including at least one thin film transistor; a second semiconductor element including at least one thin film transistor; a resin film formed between the first semiconductor element and the second semiconductor element; a light emitting element electrically

connected to the first semiconductor element; and a light receiving element electrically connected to the second semiconductor element, where the first semiconductor element and the second semiconductor element are stacked. Independent claims 5-8 have been amended to recite similar features. The Applicant respectfully submits that Ovshinsky and Mueller, either alone or in combination, do not teach or suggest the above-referenced features of amended claims 1-8.

Independent claims 9 and 10 have been amended to recite a first thin film integrated circuit including at least one thin film transistor and a light emitting element and an interface; and a second thin film integrated circuit including at least one thin film transistor and a light receiving element, wherein the second thin film integrated circuit is attached to the first thin film integrated circuit with a resin. That is, claims 9 and 10 have been amended to recite first and second thin film integrated circuits. Also, claims 9 and 10 have been amended to recite an interface included in the first thin film integrated circuit, which is supported in the present specification, for example, by page 24, lines 10-18, and paragraph [0096]. The Applicant respectfully submits that Ovshinsky and Mueller, either alone or in combination, do not teach or suggest the above-referenced features of amended claims 9 and 10.

Dependent claim 11 has been amended to include the features of claims 12-15, and, at this opportunity, the Applicant has changed "watch card" to "watch." Accordingly, dependent claims 12-15 have been canceled.

Dependent claim 22 has been amended to depend on and correspond with amended claims 1-8.

Since Ovshinsky and Mueller do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Paragraph 4 of the Official Action rejects claim 20 as obvious based on the combination of Ovshinsky, Mueller and U.S. Patent Application Publication No. 2002-0027206 to Yuan.

Please incorporate the arguments above with respect to the deficiencies in Ovshinsky and Mueller. Yuan does not cure the deficiencies in Ovshinsky and Mueller. Yuan is relied upon to allegedly teach an "organic light emitting device" (page 6, Paper No. 20070115). However, Ovshinsky, Mueller and Yuan, either alone or in combination, do not teach or suggest (1) that Ovshinsky should be modified such that a light emitting element is electrically connected to a semiconductor element; (2) a first semiconductor element including at least one thin film transistor; a second semiconductor element including at least one thin film transistor; a resin film formed between the first semiconductor element and the second semiconductor element; a light emitting element electrically connected to the first semiconductor element; and a light receiving element electrically connected to the second semiconductor element, where the first semiconductor element and the second semiconductor element are stacked; or (3) a first thin film integrated circuit including at least one thin film transistor and a light emitting element and an interface; and a second thin film integrated circuit including at least one thin film transistor and a light receiving element.

Since Ovshinsky, Mueller and Yuan do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New dependent claims 23-27 have been added to recite additional protection to which the Applicant is entitled. Claim 23 and 27 are supported in the present specification, for example, by Figures 14A and 14B. Claim 24 is supported in the present specification, for example, by the disclosure at page 14, lines 19-20, paragraph 41. Claims 25 and 26 are supported in the present specification, for example, by Figure

3B. For the reasons stated above and already of record, Applicant respectfully submits that new claims 23-27 are in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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